

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America  
v.

Mark PEREZ

Case No.

Case: 2:23-mj-30303

Assigned To : Unassigned

Assign. Date : 7/25/2023

Description: COMP USA V. PEREZ  
(KB)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 25, 2023 and July 13, 2023 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section*  
18 U.S.C. § 1073

*Offense Description*  
Interstate Flight to Avoid Prosecution

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: 7/25/2023

City and state: Detroit, Michigan



*Complainant's signature*

Special Agent Rachel Shepard (FBI)

*Printed name and title*



*Judge's signature*

Hon. R. Steven Whalen, U.S. Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR  
A COMPLAINT AND ARREST WARRANT**

I, Rachel M. Shepard, being sworn, depose and state the following:

**INTRODUCTION AND AGENT BACKGROUND**

1. I have been employed as a Special Agent with the Federal Bureau of Investigation (“FBI”) since January of 2016, and an FBI employee for over 13 years. I am currently assigned to the FBI Detroit Division’s Violent Crime Task Force. As a federal agent, I am authorized to investigate violations of laws of the United States and execute warrants issued under the authority of the United States.

2. This affidavit is in support of a complaint and arrest warrant for MARK PEREZ, date of birth XX/XX/1972. This affidavit is submitted for the limited purpose of establishing probable cause and does not include all the information known to law enforcement related to this investigation.

3. The information contained in this affidavit is based on my personal knowledge and observations during the course of this investigation, law enforcement reports that I have reviewed, communications with others who have personal knowledge of the events and circumstances described in this affidavit, and information gained through my training and experience.

4. PEREZ currently has one five count felony warrant out of the state of Michigan for “Criminal Sexual Conduct – First Degree (Mentally Disabled – Relationship),” in violation of Michigan Compiled Laws (MCL) 750.520b(1)(h),

“Criminal Sexual Conduct – Second Degree (Mentally Disabled – Relationship),” in violation of Michigan Compiled Laws (MCL) 750.520c(1)(h), and “Criminal Sexual Conduct – Third Degree (Incest),” in violation of Michigan Compiled Laws (MCL) 750.520d(1)(d), which took place on/about June 9, 2021. The state warrant was signed on May 24, 2023, in District Court 33 located in Wayne County, Michigan. As set forth herein, probable cause exists that PEREZ traveled from Michigan to another state with the intent to avoid prosecution for the above referenced offenses, in violation of 18 U.S.C. § 1073 (interstate flight to avoid prosecution).

### **PROBABLE CAUSE**

5. On June 9, 2021, Victim 1 (minor child under the care, custody or control of MARK PEREZ), a student in special education in a school district in the Eastern District of Michigan, reported to school officials that Victim 1 and Victim 1’s sibling, Victim 2 (minor child under the care, custody, or control of MARK PEREZ), had been sexually assaulted by MARK PEREZ. Both Victim 1 and Victim 2 are mentally disabled.

6. An investigation conducted by law enforcement, including interviews of school officials and victims, and DNA comparison testing led to the issuance of a nine-count warrant for MARK PEREZ on May 23, 2023.

7. On May 25, 2023, investigators made contact with PEREZ's attorney who advised that PEREZ was getting his affairs in order before turning himself in.

8. On July 11, 2023, a Gibraltar police officer made contact with an individual at PEREZ's known address in the Eastern District of Michigan. The individual identified himself as a realtor and stated that PEREZ's house had been sold and the new owners were currently moving in. As of July 19, 2023 PEREZ had failed to turn himself in to authorities.

9. A LEIN search for MARK PEREZ (DOB: XX/XX/1972) returned an Ohio Driver Registration for MARK PEREZ at 5X Franzen Lane, Akron, Ohio.

10. A Flock License Plate Reader (LPR) in Ohio picked up PEREZ's Ford Mustang, currently Ohio license plate JXX7688, numerous times in the area of Akron and Cuyahoga Falls, Ohio, as recently as July 13, 2023. Most recently the vehicle was captured at the intersection of Home Ave and East Tallmadge Avenue SB in Akron, Ohio.

### **CONCLUSION**

11. Probable cause exists that MARK PEREZ did move and travel in interstate commerce with intent to avoid prosecution and/or imprisonment for "Criminal Sexual Conduct – First Degree, Second Degree and Third Degree" which took place on/about June 9, 2021, a felony under the laws of the State of

Michigan (750.520b(1)(h)), in violation of 18 U.S.C. § 1073, (interstate flight to avoid prosecution).

Respectfully submitted,



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Rachel M. Shepard, Special Agent  
Federal Bureau of Investigation

Sworn to before me and signed in my  
presence and/or by reliable electronic means.



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Honorable R. Steven Whalen  
United States Magistrate Judge